

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE  
JOSE E RIVERA RODRIGUEZ**

**CASE NO. 11-04809-ESL**

**DEBTOR(S)**

**CHAPTER 13**

**OBJECTION TO CONFIRMATION**

**TO THE HONORABLE COURT:**

Comes now, RELIABLE FINANCIAL SERVICES, INC., holder of a secured claim and Movant herein, through the undersigned attorney, and very respectfully Alleges and Prays:

1. Debtors' filed a petition for relief under Chapter 13 of the Bankruptcy Code on JUNE 4, 2011.

2. Debtors' Chapter 13 Plan proposes for a total base of \$37,800.00; to pay in full the secured claim to creditor BPPR in the amount of \$2,500.00; to pay in full the secured claim to creditor RELIABLE in the amount of \$32,878.60; provide insurance through Triple SSS Insurance; the Chapter 13 Trustee's and attorney's fees and remaining funds to be distributed on a prorata basis to the general unsecured claims class.

3. According to the debts listed in debtor's proposed Chapter 13 Plan to be paid in full by Trustee by virtue of security, the Plan falls short of funds, thus having "mathematical failure" which prevents its confirmation. [11 USC 1325 (a)(1)].

**WHEREFORE**, Movant prays this Court that debtor's Plan be denied confirmation at the Hearing on Confirmation and for such other relief as may appear appropriate to the Court.

**CERTIFICATE OF SERVICE**

I hereby certify that present motion was filed electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the **ALEJANDRO OLIVERAS**, Trustee and **JOSE M PRIETO CARBALLO**, Debtor(s) Attorney and that we have sent copy of this document through regular mail to Debtor(s) **JOSE E RIVERA RODRIGUEZ, PO BOX 2289 CANOVANAS, PR 00729**.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 27TH day of JULY, 2011.

**/S/ CARLOS E. PEREZ PASTRANA**  
**USDC-208913**  
Attorney for Movant  
PO BOX 21382  
SAN JUAN, PR 00928-1382  
TEL. 787-625-6645 FAX: 787-625-4891  
[cperezp@reliablefinancial.com](mailto:cperezp@reliablefinancial.com)